I've been an FCC amateur radio licensee as well as licensed professional engineer for several decades. I hold a bachelors degree and a masters degree in engineering. My main interest in amateur radio is as a means for experimentation and advancement of radio technology.

The purpose of Docket No. 16-239, RM-11708 is to provide a pathway for technically inclined radio amateurs to continue to made advancements in radio communications technology and capabilities, by developing and using more spectrum efficient data communications. Approval of RM-11708 would be in alignment with 47CFR97.1(b). Rejection of RM-11708 would be counter to 97.1(b).

I support the filing made by the Amateur Radio Safety Foundation, Inc for Docket No. 16-239, RM-11708. The concerns and comments expressed by many of those in opposition to 16-239 are not based in fact or data.

Therefore, I urge the Commission to drop the 300 baud limit for MF and HF data communications on amateur radio frequencies and instead apply an occupied bandwidth limit in its place.

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